

11.0 References

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Appendix A

Documents Reviewed

APPENDIX A

Documents Reviewed

CH2M HILL. 2001. Five-Year Review Report for Stringfellow Hazardous Waste Site, Glen Avon, California. September.

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Appendix B
Five-Year Review Site Inspection Checklist

APPENDIX B

Five-Year Review Site Inspection Checklist

The site inspection checklist is presented in this appendix. Table B-1 presents the individuals that were present for the site inspection performed on April 10 and 11, 2006.

TABLE B-1

Site Inspection Team Roster, April 10 and 11, 2006

Third Five-Year Review Report, Stringfellow Superfund Site, Riverside County, California

Name	Title	Affiliation
Ziggy Kostecki	Hazardous Substances Engineer	DTSC
Charnjit Bhullar	USEPA Remedial Project Manager	USEPA
Alexa Stamets	Project Manager	CH2M HILL
Tom Perina	Project Consultant	CH2M HILL
Ken Martins	Senior Technologist	CH2M HILL

I. SITE INFORMATION	
Site name: Stringfellow Superfund Site	Date of inspection: April 10 and 11, 2006
Location and Region: Riverside, CA, Region 9	EPA ID: CAT080012826
Agency, office, or company leading the five-year review: EPA Region 9	Weather/temperature: Cool, around 60° F. Overcast. Afternoon of April 11, 2006, transitions to sunny, around 65°F.
Remedy Includes: (Check all that apply) <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Landfill cover/containment <input checked="" type="checkbox"/> Access controls Institutional controls <input checked="" type="checkbox"/> Groundwater pump and treatment <input checked="" type="checkbox"/> Surface water discharge collection channels <input checked="" type="checkbox"/> Erosion control 	
Attachments: <input checked="" type="checkbox"/> Inspection team roster attached <input checked="" type="checkbox"/> Site map attached [in report]	
II. INTERVIEWS	
O&M site manager Name : Ziggy Kostecki Title: Hazardous Substances Engineer Interviewed: April 11, 2006 Phone No.: 951/360-6942 Problems, suggestions: <ul style="list-style-type: none"> Department of Toxic Substances Control's (DTSC) onsite operations and maintenance contractor, Earth Tech, has insufficient resources to maintain the site's reporting and maintenance schedule. This has resulted in delays in the project schedule. Routine groundwater monitoring should continue to establish trends in constituent concentrations in groundwater in Zones 1, 2, and 3, where extraction wells were last installed in 1998. The trends in concentrations in these areas are difficult to ascertain with only 8 years of monitoring data. <p>Refer to the interview record for Mr. Kostecki for additional suggestions identified during the interview.</p> <p style="text-align: center;">NOTE: All referenced attachments can be found in Five-Year Review Report.</p>	
Other interviews:	
1) Allen Wolfenden/DTSC 2) Allen Winans/DTSC 3) Roger Paulson/DTSC	

III. ONSITE DOCUMENTS AND RECORDS VERIFIED (Check all that apply)			
O&M Documents <div style="display: flex; justify-content: space-between;"> <div><input checked="" type="checkbox"/> O&M manuals</div> <div><input checked="" type="checkbox"/> Readily available</div> <div><input checked="" type="checkbox"/> Up to date</div> </div> <div style="display: flex; justify-content: space-between;"> <div><input checked="" type="checkbox"/> As-built drawings</div> <div><input checked="" type="checkbox"/> Readily available</div> <div><input checked="" type="checkbox"/> Up to date</div> </div> <div style="display: flex; justify-content: space-between;"> <div><input checked="" type="checkbox"/> Maintenance logs</div> <div><input checked="" type="checkbox"/> Readily available</div> <div><input checked="" type="checkbox"/> Up to date</div> </div> <p>Remarks: Maintenance logs provided in monthly operations, maintenance, and monitoring reports. O&M manuals were updated in December 2005/ January 2006. The O&M Plan that addresses inspection of the cap and surface drainage channels is in the process of being updated (last updated in 2000).</p>			
<input checked="" type="checkbox"/> Site-Specific Health and Safety Plan <input checked="" type="checkbox"/> Readily available <input checked="" type="checkbox"/> Up to date (December 30, 2005) <input checked="" type="checkbox"/> Contingency plan/emergency response plan <input checked="" type="checkbox"/> Readily available <input checked="" type="checkbox"/> Up to date <p>Remarks: The Contingency plan/emergency response plan is included in Chapter 6 of the Safety, Health, and Emergency Response Plan (SHERP), 2005 Annual Update (Earth Tech 2005).</p>			
<input checked="" type="checkbox"/> O&M and OSHA Training Records <input checked="" type="checkbox"/> Readily available <input checked="" type="checkbox"/> Up to date <p>Remarks: Monthly O&M reports available onsite. OSHA records for contractors, subcontractors, and visitors to the site are stored onsite.</p>			
Permits and Service Agreements <div style="display: flex; justify-content: space-between;"> <div>Air discharge permit</div> <div>Readily available</div> <div>Up to date</div> </div> <div style="display: flex; justify-content: space-between;"> <div><input checked="" type="checkbox"/> Effluent discharge</div> <div><input checked="" type="checkbox"/> Readily available</div> <div><input checked="" type="checkbox"/> Up to date</div> </div> <div style="display: flex; justify-content: space-between;"> <div><input checked="" type="checkbox"/> Waste disposal, POTW</div> <div><input checked="" type="checkbox"/> Readily available</div> <div><input checked="" type="checkbox"/> Up to date</div> </div> <div style="display: flex; justify-content: space-between;"> <div>Other permits _____</div> <div>Readily available</div> <div>Up to date</div> </div> <p>Remarks: Effluent discharge permits for discharge to Pyrite Creek and to the Santa Ana Regional Interceptor (SARI) pipeline were available for review during the site inspection. Documentation of profiles for disposal of filter cake waste to offsite landfills also available. The site does not have an air discharge permit.</p>			
Gas Generation Records	Readily available	Up to date	<input checked="" type="checkbox"/> N/A
<p>Remarks:</p>			
Settlement Monument Records	Readily available	Up to date	<input checked="" type="checkbox"/> N/A
<p>Remarks:</p>			
<input checked="" type="checkbox"/> Groundwater Monitoring Records <input checked="" type="checkbox"/> Readily available <input checked="" type="checkbox"/> Up to date <p>Remarks: Semiannual groundwater monitoring reports available onsite.</p>			
<input checked="" type="checkbox"/> Leachate Extraction Records <input checked="" type="checkbox"/> Readily available <input checked="" type="checkbox"/> Up to date <p>Remarks: Analytical and flow rate data for groundwater extraction wells available in monthly operations, maintenance, and monitoring reports. The most recent report for February 2006 was available for review during the site inspection.</p>			

<input checked="" type="checkbox"/> Discharge Compliance Records <div style="display: flex; justify-content: space-between;"> Air Readily available Up to date </div> <div style="display: flex; justify-content: space-between;"> <input checked="" type="checkbox"/> Water (effluent) <input checked="" type="checkbox"/> Readily available <input checked="" type="checkbox"/> Up to date </div> <p>Remarks: Effluent compliance is evaluated in the monthly operations, maintenance, and monitoring reports. Effluent data are provided in these reports. Air discharge data is not recorded. The site does not currently have a permit for discharges to air.</p>																							
Daily Access/Security Logs <input checked="" type="checkbox"/> Readily available <input checked="" type="checkbox"/> Up to date <p>Remarks: Site access logs included in monthly operations, maintenance, and monitoring reports.</p>																							
IV. O&M COSTS																							
O&M Organization <div style="display: flex; justify-content: space-between;"> PRP in-house: DTSC Contractor for PRP: Earth Tech and Geologic Associates </div>																							
O&M Cost Records <div style="display: flex; justify-content: space-between;"> Readily available Up to date </div> <div style="display: flex; justify-content: space-between;"> Funding mechanism/agreement in place <input checked="" type="checkbox"/> Not available </div> <p>Original O&M cost estimate _____ Breakdown attached</p> <p style="text-align: center;">Total annual cost by year for review period if available</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Date</th> <th style="width: 25%;">Date</th> <th style="width: 25%;">Total cost</th> <th style="width: 25%;"></th> </tr> </thead> <tbody> <tr> <td>From _____</td> <td>To _____</td> <td>_____</td> <td>Breakdown attached</td> </tr> <tr> <td style="text-align: center;">Date</td> <td style="text-align: center;">Date</td> <td style="text-align: center;">Total cost</td> <td></td> </tr> <tr> <td>From _____</td> <td>To _____</td> <td>_____</td> <td>Breakdown attached</td> </tr> <tr> <td style="text-align: center;">Date</td> <td style="text-align: center;">Date</td> <td style="text-align: center;">Total cost</td> <td></td> </tr> </tbody> </table> <p>Remarks: Costs were not made available by DTSC for evaluation as during the five-year review.</p>				Date	Date	Total cost		From _____	To _____	_____	Breakdown attached	Date	Date	Total cost		From _____	To _____	_____	Breakdown attached	Date	Date	Total cost	
Date	Date	Total cost																					
From _____	To _____	_____	Breakdown attached																				
Date	Date	Total cost																					
From _____	To _____	_____	Breakdown attached																				
Date	Date	Total cost																					
Unanticipated or Unusually High O&M Costs During Review Period <p>Describe costs and reasons: Additional contaminants of concern (perchlorate, pesticides, NDMA, 1,4-dioxane) were identified during the review period that resulted in changes to on-site O&M. Upgrades to the PTP were made during the review period to treat pesticides in groundwater before metal and VOC treatment. Treatment of pesticide-laden filter cake, which requires incineration, resulted in increased costs associated with operation of the PTP. Polymer resin columns were added to the community wellhead treatment system to treat perchlorate in Zone 4. The columns require replacement approximately every two months, resulting in expenses of approximately \$12,000 every two months.</p>																							
V. ACCESS AND INSTITUTIONAL CONTROLS																							
A. Fencing																							
<input checked="" type="checkbox"/> Fencing <p>Remarks: Fencing is in good condition, and surrounds Zone 1 and the three treatment systems</p>																							

(PTP, LCTF, and CWTS). Fences are locked, and no indication of vandalism to fencing was noted during the site inspection.							
B. Other Access Restrictions							
<input checked="" type="checkbox"/> Signs and other security measures Remarks: Signage posted on fence to prevent trespassers from entering secure portions of the site. A security guard (Seibert Security, Inc.) is stationed adjacent to the PTP and entrance to Zone 1 between 7 A.M. and 5 P.M. All visitors to the site must sign in with the security guard between these hours. A security guard patrols the grounds of the site on an hourly basis between 5 P.M. and 7 A.M. to ensure trespassers are not present on site.							
C. Institutional Controls							
Implementation and enforcement							
Site conditions imply ICs not properly implemented	Yes	No	<input checked="" type="checkbox"/> N/A				
Site conditions imply ICs not being fully enforced	Yes	No	<input checked="" type="checkbox"/> N/A				
Remarks: No institutional controls have been recorded for the site.							
Reporting is up-to-date	Yes	No	<input checked="" type="checkbox"/> N/A				
Reports are verified by the lead agency	Yes	No	<input checked="" type="checkbox"/> N/A				
Specific requirements in deed or decision documents have been met	Yes	No	<input checked="" type="checkbox"/> N/A				
Violations have been reported	Yes	No	<input checked="" type="checkbox"/> N/A				
Other problems or suggestions: Institutional controls should be recorded to prevent disturbance of soil in the original disposal area in Zone 1, to prohibit construction of structures in Zones 1 and 2, and to further prevent unauthorized uses of groundwater in the Glen Avon community area in Zone 4.							
<table style="width: 100%; border: none;"> <tr> <td style="width: 33%;">Adequacy</td> <td style="width: 33%;">ICs are adequate</td> <td style="width: 33%; text-align: center;"><input checked="" type="checkbox"/> ICs are inadequate</td> <td style="width: 33%; text-align: center;">N/A</td> </tr> </table> Remarks: Please refer to the review of ICs in the Five-year Review Report (Appendix E).				Adequacy	ICs are adequate	<input checked="" type="checkbox"/> ICs are inadequate	N/A
Adequacy	ICs are adequate	<input checked="" type="checkbox"/> ICs are inadequate	N/A				
D. General							
Vandalism/trespassing Remarks: No indications of vandalism were observed during the site inspection. Mr. Kostecki indicated that vehicles occasionally crash into the entry gate to the former disposal area. In addition, children from nearby communities occasionally trespass onto the site, but no significant vandalism has been recorded as a result of this trespass activity.							
Land use changes onsite Remarks: No significant changes during the period. Quarry operations are being performed in Zones 2 and 3 (off DTSC property).							
Land use changes offsite Remarks: Housing developments have been constructed to the north of the site (other side of the hill located north of the site).							

VI. GENERAL SITE CONDITIONS	
A. Roads	<input checked="" type="checkbox"/> Applicable
Roads <input checked="" type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> Roads adequate Remarks:	
B. Other Site Conditions	
Remarks:	
VII. LANDFILL COVERS	
A. Landfill Surface	
<input checked="" type="checkbox"/> Settlement (Low spots) Remarks: Some settlement is occurring across the former disposal areas. The degree of settlement is not quantified through monitoring. An area of subsidence within the southern disposal area was capped with drill cuttings and asphalt in the early 1990s.	
Cracks Remarks:	Location shown on site map <input checked="" type="checkbox"/> Cracking not evident
<input checked="" type="checkbox"/> Erosion Location shown on site map <input checked="" type="checkbox"/> Erosion not evident Remarks: No significant erosion observed during the site inspection.	
<input checked="" type="checkbox"/> Holes <input checked="" type="checkbox"/> Location shown on site map Holes not evident Areal extent: Approximately 3-feet in diameter. Depth: Approximately five feet. Remarks: A sinkhole was identified at the southern edge of the northern former disposal area during the week of April 3, 2006 following a heavy rainfall event, and was evident during the site inspection. The cause of the sinkhole is being evaluated by Geologic Associates. Sinkholes have not been observed at the site previously.	
<input checked="" type="checkbox"/> Vegetative Cover Grass <input checked="" type="checkbox"/> Cover properly established No signs of stress Remarks: Weeds and sunflowers are growing on the surface of the cover. The cover needs maintenance, which will be performed at the end of the rain season.	
Alternative Cover (armored rock, concrete, etc.) <input checked="" type="checkbox"/> N/A Remarks	
Bulges Areal extent _____ Height _____ Remarks	Location shown on site map <input checked="" type="checkbox"/> Bulges not evident
Wet Area/Water Damage <input checked="" type="checkbox"/> Wet areas/water damage not evident Wet areas Location shown on site map Areal extent Ponding Location shown on site map Areal extent Seeps Location shown on site map Areal extent Soft subgrade Location shown on site map Areal extent Remarks: Groundwater levels beneath the former ponds are maintained through pressure transducers in extraction wells. No ponding was observed during the site inspection.	

Slope Instability Slides Areal extent _____ Remarks _____	Location shown on site map <input checked="" type="checkbox"/> No evidence of slope instability	
B. Benches <input checked="" type="checkbox"/> N/A (Horizontally constructed mounds of earth placed across a steep landfill side slope to interrupt the slope to slow down the velocity of surface runoff and intercept and convey the runoff to a lined channel.)		
Flows Bypass Bench Remarks _____	Location shown on site map	N/A or okay
Bench Breached Remarks _____	Location shown on site map	N/A or okay
Bench Overtopped Remarks _____	Location shown on site map	N/A or okay
C. Letdown Channels <input checked="" type="checkbox"/> N/A (Channel lined with erosion control mats, riprap, grout bags, or gabions that descend down the steep side slope of the cover and will allow the runoff water collected by the benches to move off of the landfill cover without creating erosion gullies.)		
Settlement Areal extent _____ Remarks _____	Location shown on site map Depth _____	No evidence of settlement
Material Degradation Material type _____ Remarks _____	Location shown on site map Areal extent _____	No evidence of degradation
Erosion Areal extent _____ Remarks _____	Location shown on site map Depth _____	No evidence of erosion
Undercutting Areal extent _____ Remarks _____	Location shown on site map Depth _____	No evidence of undercutting
Obstruction Location shown on site map Size _____ Remarks _____	Type _____ Areal extent _____	No obstruction
Excessive Vegetative Growth Type _____ No evidence of excessive growth Vegetation in channels does not obstruct flow Location shown on site map Remarks _____		
D. Cover Penetrations <input checked="" type="checkbox"/> Applicable		

Gas Vents	Active	Passive	Routinely sampled	Good
Properly secured/located		Functioning		
Evidence of leakage at penetration		<input checked="" type="checkbox"/> N/A		
Remarks				
2. Gas Monitoring Probes				
Properly secured/located		Functioning	Routinely sampled	Good
Evidence of leakage at penetration		<input checked="" type="checkbox"/> N/A		
Remarks				
<input checked="" type="checkbox"/> Monitoring Wells (within surface area of landfill)				
<input checked="" type="checkbox"/> Properly secured/located	<input checked="" type="checkbox"/> Functioning	<input checked="" type="checkbox"/> Routinely sampled	<input checked="" type="checkbox"/> Good condition	
Evidence of leakage at penetration				
Remarks				
<input checked="" type="checkbox"/> Leachate Extraction Wells				
<input checked="" type="checkbox"/> Properly secured/located	<input checked="" type="checkbox"/> Functioning	<input checked="" type="checkbox"/> Routinely sampled	<input checked="" type="checkbox"/> Good condition	
Evidence of leakage at penetration		Needs O&M	N/A	
Remarks				
Settlement Monuments	Located	Routinely surveyed	<input checked="" type="checkbox"/> N/A	
Remarks				
E. Gas Collection and Treatment			<input checked="" type="checkbox"/> N/A	
Gas Treatment Facilities				
Flaring	Thermal destruction	Collection for reuse		
Good condition	Needs O&M			
Remarks				
2. Gas Collection Wells, Manifolds and Piping				
Good condition	Needs O&M			
Remarks				
Gas Treatment Facilities (e.g., gas monitoring of adjacent homes or buildings)				
Good condition	Needs O&M	N/A		
Remarks				
F. Cover Drainage Layer	<input checked="" type="checkbox"/> Applicable	N/A		
Outlet Pipes Inspected	<input checked="" type="checkbox"/> Functioning	N/A		
Remarks: No debris or other blockage in outlet pipe.				
Outlet Rock Inspected	Functioning	<input checked="" type="checkbox"/> N/A		
Remarks				
G. Detention/Sedimentation Ponds		<input checked="" type="checkbox"/> N/A		

Siltation	Areal extent _____	Depth _____	N/A
	Siltation not evident		
	Remarks		
Erosion	Areal extent _____	Depth _____	
	Erosion not evident		
	Remarks		
Outlet Works	Functioning	N/A	
	Remarks		
Dam	Functioning	N/A	
	Remarks		
H. Retaining Walls	<input checked="" type="checkbox"/> N/A		
Deformations	Location shown on site map	Deformation not evident	
	Horizontal displacement _____	Vertical displacement _____	
	Rotational displacement _____		
	Remarks		
Degradation	Location shown on site map	Degradation not evident	
	Remarks		
I. Perimeter Ditches/Off-Site Discharge	<input checked="" type="checkbox"/> Applicable		N/A
Siltation	Location shown on site map	<input checked="" type="checkbox"/> Siltation not evident	
Remarks: Minimal siltation observed in discharge channels, indicating minimal erosion from the cap.			
Vegetative Growth	<input checked="" type="checkbox"/> Location shown on site map	N/A	
	Vegetation does not impede flow		
	Areal extent _____ Type: Various weeds.		
Remarks: A portion of the surface water discharge channel is not lined with concrete (in Zones 2 and 3). Significant vegetative growth in this portion of the discharge channel, impeding the flow of surface water along the discharge channel. Much of the surface water in this section of the discharge channel likely infiltrates through the subsurface to the water table.			
Erosion	Location shown on site map	<input checked="" type="checkbox"/> Erosion not evident	
Remarks:			
Discharge Structure	<input checked="" type="checkbox"/> Functioning	N/A	
Remarks: Discharge weir at the surface water discharge channel in Zone 2.			

VIII. VERTICAL BARRIER WALLS

Settlement	Location shown on site map	Settlement not evident <input checked="" type="checkbox"/> Settlement not recorded.
	Depth: 30 to 80 feet bgs.	
Remarks: Clay barrier dam between Zones 1A and 1B.		

Performance Monitoring		Type of monitoring	
<input checked="" type="checkbox"/> Performance not monitored			
Frequency _____	Evidence of breaching		
Head differential			
Remarks:			
IX. GROUNDWATER/SURFACE WATER REMEDIES			
A. Groundwater Extraction Wells, Pumps, and Pipelines		<input checked="" type="checkbox"/> Applicable	
Pumps, Wellhead Plumbing, and Electrical			
<input checked="" type="checkbox"/> Good condition	All required wells located	Needs O&M	N/A
Remarks:			
Extraction System Pipelines, Valves, Valve Boxes, and Other Appurtenances			
<input checked="" type="checkbox"/> Good condition	Needs O&M		
Remarks: Extraction wells are being taken out of service (one at a time) to be redeveloped, and are then placed back in service.			
Spare Parts and Equipment			
<input checked="" type="checkbox"/> Readily available	Good condition	Requires upgrade	Needs to be provided
Remarks: Pressure transducers in the extraction wells are replaced as needed, and calibrated annually.			
B. Surface Water Collection Structures, Pumps, and Pipelines		<input checked="" type="checkbox"/> N/A	
Collection Structures, Pumps, and Electrical			
Good condition	Needs O&M		
Remarks			
Surface Water Collection System Pipelines, Valves, Valve Boxes, and Other Appurtenances			
Good condition	Needs O&M	NA	
Remarks			
Spare Parts and Equipment			
Readily available	Good condition	Requires upgrade	Needs to be provided
Remarks			

C. Treatment System <input checked="" type="checkbox"/> Applicable			
Treatment Train (Check components that apply) <input checked="" type="checkbox"/> Metals removal Oil/water separation Bioremediation Air stripping <input checked="" type="checkbox"/> Carbon adsorbers <input checked="" type="checkbox"/> Filters <input checked="" type="checkbox"/> Additive (e.g., chelation agent, flocculent) <input checked="" type="checkbox"/> Good condition Needs O&M <input checked="" type="checkbox"/> Sampling ports properly marked and functional <input checked="" type="checkbox"/> Sampling/maintenance log displayed and up to date <input checked="" type="checkbox"/> Equipment properly identified Quantity of groundwater treated annually: Approximately 45 million gallons treated annually Quantity of surface water treated annually: 0 Remarks: The PTP is in the process of being upgraded. Upgrades include installation of a rapid mix and flocculator to the pesticide removal system and installation of an air stripper to optimize VOC removal from air. The filter press on the PTP was replaced in 2005.			
Electrical Enclosures and Panels (properly rated and functional) N/A <input checked="" type="checkbox"/> Good condition Needs O&M Remarks			
Tanks, Vaults, Storage Vessels N/A <input checked="" type="checkbox"/> Good condition Remarks			
Discharge Structure and Appurtenances <input checked="" type="checkbox"/> Good condition Needs O&M Remarks: Effluent from PTP and LCTF is held in onsite tanks, before being pumped through an effluent pipeline to the SARI pipeline. Effluent from the CWTS is discharged directly to Pyrite Creek.			
Treatment Building(s) – support building <input checked="" type="checkbox"/> N/A Good condition (especially roof and doorways) Needs repair Chemicals and equipment properly stored Remarks			
Monitoring Wells (pump and treatment remedy) <input checked="" type="checkbox"/> Properly secured/locked <input checked="" type="checkbox"/> Functioning <input checked="" type="checkbox"/> Routinely sampled <input checked="" type="checkbox"/> Good condition All required wells located Needs O&M N/A Remarks			
D. Monitored Natural Attenuation <input checked="" type="checkbox"/> N/A			
Monitoring Wells (natural attenuation remedy) Properly secured/locked Functioning Routinely sampled Good condition All required wells located Needs O&M Remarks			

X. OTHER REMEDIES	
<p>If there are remedies applied at the site which are not covered above, attach an inspection sheet describing the physical nature and condition of any facility associated with the remedy. An example would be soil vapor extraction.</p>	
XI. OVERALL OBSERVATIONS	
A.	<p>Implementation of the Remedy</p>
<p>Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (that is, to contain contaminant plume, minimize infiltration and gas emission, etc.).</p> <p>The purpose of the remedy at the site is to prevent the migration of contaminants in groundwater, extract and treat contaminated groundwater, and prevent direct and indirect contact with contaminated media. The remedy identified in the RODs for the site has been implemented as prescribed in the RODs. Improvements to the treatment systems have been made as new contaminants are identified in groundwater at the site. Contaminant concentrations are generally stable or are decreasing with time. The remedy is effective and is functioning as designed.</p>	
B.	<p>Adequacy of O&M</p>
<p>Describe issues and observations related to the implementation and scope of O&M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy.</p> <p>In general, the O&M at the site is adequate.</p>	

C.	<p>Early Indicators of Potential Remedy Failure</p> <p>Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of unscheduled repairs that suggest that the protectiveness of the remedy may be compromised in the future.</p> <p>Elevated concentrations of perchlorate were detected at the site since the last ROD. Polymer resin canisters were consequently added to the CWTS to treat perchlorate, and treatment of perchlorate commenced in 2003. While the existing CWTS is serving to extract and treat perchlorate-contaminated groundwater in Zone 4, additional investigation is required to define the extent of perchlorate in Zone 4 and to facilitate the selection of a remedy to address the perchlorate in groundwater. A RI/FS is currently underway to address this issue.</p> <p>In addition, higher than expected pesticide levels were detected in groundwater extracted from new Zone 1 extraction wells that started operating in 2003. This resulted in premature breakthrough of the GAC canisters in the PTP. In addition, incineration was required on the filter cake due to elevated pesticide concentrations. Consequently, improvements were made to the PTP to specifically treat pesticides in groundwater by installing a pesticide removal system as the first step in treatment at the PTP. The goal of the pesticide removal system was to reduce the load of pesticides to the downstream processes in the PTP and to improve the overall efficiency of the PTP. Other improvements to the PTP have been performed as necessary. A new PTP is currently being designed to treat new contaminants that have been detected at elevated concentrations since the last ROD was recorded.</p>
D.	<p>Opportunities for Optimization</p> <p>Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy.</p> <p>Previous modeling studies have shown that the existing groundwater extraction systems in Zones 2 and 3 may not efficiently intercept and capture site-related contaminants in deeper flow channels and weathered bedrock units. The effectiveness of the existing extraction systems in Zones 2 and 3 should be evaluated to identify the need for system upgrades and/or system optimization.</p>